

From: [Giguere, Cary](#)
To: [Rowe, Brian \(MDA\)](#); [Bonnie Rabe](#); [Charlie Clark](#); [Helfgott, Daniel](#); [scottde@purdue.edu](#); [Stangel, David](#); [gfarnsworth@cdpr.ca.gov](#); [Green, Jamie](#); [Comstock, Jeff](#); [john.peckham@state.mn.us](#); [Simpson, Julie](#); [laura.quakenbush@ag.state.co.us](#); [Richard Beard](#); [Roelofs, James](#); [Kendall, Ronald](#); [Rose Kachadoorian](#); [Shannon Joyner](#); [Steve Dwinell](#); [Vicki Cassens](#)
Cc: [jgray@nd.gov](#); [Scott, John \(John.Scott@ag.state.co.us\)](#); [Laws, Meredith](#)
Subject: RE: Proposed Labeling for Neonicotinoid Products
Date: Wednesday, July 31, 2013 9:37:19 AM

Hello

I know I had originally proposed 10:00am EST for the call to talk about this, but have gotten some feedback that 1:00pm would work better for some.

Thanks for the comments so far.

Call in

Passcode

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From: Rowe, Brian (MDA) [<mailto:roweb@michigan.gov>]
Sent: Wednesday, July 31, 2013 9:06 AM
To: Giguere, Cary; Bonnie Rabe; Charlie Clark; Daniel Helfgott; Dave Scott; David Stangel; George Farnsworth; Jamie Green; Comstock, Jeff; John Peckham; Julie Simpson; Laura Quakenbush; Richard Beard; roelofs.jim@epa.gov; Ron Kendall; Rose Kachadoorian; Shannon Joyner; Steve Dwinell; Vicki Cassens
Cc: Gray, Jim A.; Scott, John (John.Scott@ag.state.co.us); Meredith Laws (Laws.Meredith@epamail.epa.gov)
Subject: RE: Proposed Labeling for Neonicotinoid Products

I don't like it. Nothing regulatory about it but the public and beekeepers will expect us to use it to protect bees. At the PPDC we talked about pesticide specific labeling (no one statement fits all) that allows for product specific use limitations such as do not apply between the hours of.... Or do not apply when plants are in bloom.....do not apply using some specific type of equipment, etc....

Let me know when you want to talk on a call....

From: Giguere, Cary [<mailto:Cary.Giguere@state.vt.us>]
Sent: Tuesday, July 30, 2013 8:32 AM
To: Bonnie Rabe; Rowe, Brian (MDA); Giguere, Cary; Charlie Clark; Daniel Helfgott; Dave Scott; David Stangel; George Farnsworth; Jamie Green; Comstock, Jeff; John Peckham; Julie Simpson; Laura Quakenbush; Richard Beard; roelofs.jim@epa.gov; Ron Kendall; Rose Kachadoorian; Shannon Joyner; Steve Dwinell; Vicki Cassens
Cc: Gray, Jim A.; Scott, John (John.Scott@ag.state.co.us); Meredith Laws (Laws.Meredith@epamail.epa.gov)
Subject: FW: Proposed Labeling for Neonicotinoid Products

Good Morning POM Members, and others.

Please see the email below. Please review the attached proposed labeling for pollinator protection.

Let's also plan on having a conference call Thursday morning at 10 to discuss.

Call in

[REDACTED]

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[REDACTED]

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Thank you for coordinating the review of this labeling. There are 2 documents but we intend to apply both to these labels. One document is a "Pollinator Protection Box" which is like the WPS box. It would be placed below the Env. Hazards Statement. The other document is text to go into the Directions for Use. Both documents incorporate the use of a "bee icon."

This labeling is intended for foliar applied products containing imidacloprid, dinotefuran, clothianidin and thiamethoxam. Attached also is the letter from Steve Bradbury that went out to registrants last week. This provides the background.

We have discussed this labeling with our colleagues in Canada but we have not shared it with anyone else, including the registrants. We ask that POM members keep this confidential.

We would like POM's input on enforceability, whether the statements make sense, and POM's overall impression. This includes the headings in the Directions for Use document.

Thanks very much to everyone for their help on this.